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MZG:USAO# 2008R000273

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

BY

CRIMINAL NO. CCB-12-0318

GEORGE FRIMPONG EBO-AMISSAH

a/k/a "Wagba"

a/k/a "Abdallah"

a/k/a "Salifu Abdullah,"

Defendant

:  
:  
:  
: (Conspiracy to Import Heroin, 21 U.S.C.  
: § 963; Conspiracy to Distribute and  
: Possess with Intent to Distribute Heroin,  
: 21 U.S.C. § 846; Importation of Heroin,  
: 21 U.S.C. §§ 952 & 960; Aiding &  
: Abetting, 18 U.S.C. § 2)

:  
: .oOo.

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

From on or about January 2011, to on or about the date of this indictment, in the country of Ghana and elsewhere, the defendant,

**GEORGE FRIMPONG EBO-AMISSAH**

a/k/a "Wagba"

a/k/a "Abdallah"

a/k/a "Salifu Abdullah"

did knowingly and intentionally combine, conspire, confederate and agree with other co-conspirators known and unknown to the Grand Jury, to knowingly and intentionally import into the United States from Ghana a kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 952 and 960.

21 U.S.C. § 963.

**COUNT TWO**

The Grand Jury for the District of Maryland charges that:

From at least January 2011, up to and including the date of this indictment, in the District of Maryland and elsewhere, the defendant,

**GEORGE FRIMPONG EBO-AMISSAH**

**a/k/a "Wagba"**

**a/k/a "Abdallah"**

**a/k/a "Salifu Abdullah"**

did knowingly and unlawfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute a kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

21 U.S.C. § 846.

**COUNT THREE**

The Grand Jury for the District of Maryland charges that:

On or about May 29, 2011, from the country of Ghana, the defendant,

**GEORGE FRIMPONG EBO-AMISSAH**

**a/k/a "Wagba"**

**a/k/a "Abdallah"**

**a/k/a "Salifu Abdullah"**

did intentionally and knowingly import into the United States a kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. §§ 952 & 960

18 U.S.C. § 2

**FORFEITURE**

1. The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of any of the controlled substance offenses alleged in Counts 1 through 3 of this Indictment, the defendant,

**GEORGE FRIMPONG EBO-AMISSAH**

**a/k/a "Wagba"**

**a/k/a "Abdallah"**

**a/k/a "Salifu Abdullah"**


shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

**SUBSTITUTE ASSETS**

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the amount of \$100,000 (the approximate value in street sales of 1 kilogram of heroin).

  
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ROD J. ROSENSTEIN  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

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Foreperson

Date: 6/6/2012